

# **Exhibit 50**

## **Plaintiff's Response to Dynamic's Request for Admissions**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY, )  
Plaintiff, )  
v. ) Case No. 2:19-CV-767-ECM  
HYUNDAI MOTOR )  
MANUFACTURING, ALABAMA, )  
LLC; HYUNDAI ENG AMERICA, )  
INC.; and DYNAMIC SECURITY, INC.)  
Defendants. )

**PLAINTIFF'S RESPONSE TO DEFENDANT**  
**DYNAMIC SECURITY INC.'S FIRST REQUEST FOR ADMISSIONS**

Plaintiff, Davita Key, submits the following responses to Defendant Dynamic Security Inc.'s First Requests for Admissions pursuant to the agreement of the parties and Rule 36 of the Federal Rules of Civil Procedure.

## GENERAL RESPONSES

1. The word usage and sentence structure of the Responses is that of the attorney for Plaintiff who assisted in the preparation of the Responses and is not that of the person executing the response.
2. The Responses are based on information now available to Plaintiff.
3. Plaintiff has not completed her discovery in this lawsuit, nor has she completed her investigation into the claims which are the subject of this action.

and other matters relevant to this litigation.

4. In providing these Responses, Plaintiff does not waive or intend to waive, but rather preserve and intend to preserve:
  - a. All objections as to competency, relevancy, materiality, and admissibility;
  - b. The right to object on any ground to the use or admissibility of any of the answers herein or documents produced by Plaintiff in connection with the Answers in any subsequent proceedings, including the trial of this or any other action;
  - c. All objections as to vagueness and ambiguity; and
  - d. The right to object on any ground to any further Discovery Requests involving or related to any of the Individual Discovery Requests.

5. Plaintiff reserves the right to supplement any responses.

#### **REQUESTS FOR ADMISSIONS**

1. Admit that you were offered other positions by Dynamic Security after you ceased working at the Hyundai facility.

**RESPONSE:** Plaintiff denies this Request and states she was not offered any position at Dynamic Security after she was told not to return to the Hyundai facility.

2. Admit that you refused two other assignments that Dynamic Security offered you after you ceased working at the Hyundai facility.

**RESPONSE:** Plaintiff denies this Request and states she did not refuse any assignment from Dynamic Security and never received an assignment after she was told not to return to the Hyundai facility.

3. Admit that, after you ceased working at the Hyundai facility, you never contacted Dynamic Security seeking another assignment.

**RESPONSE:** Plaintiff objects to this request to the extent “ceased working at the Hyundai facility” implies any voluntary end of employment. Plaintiff denies this Request and states she contacted Dynamic multiple times and never received any return calls.

4. Admit that, after you refused two other assignments that Dynamic Security offered you, you never contacted Dynamic Security seeking another assignment.

**RESPONSE:** Plaintiff objects to this request to the extent it assumes she refused any assignment. Plaintiff denies this request and states she contacted Dynamic multiple times and never received any return calls.

5. Admit that you failed to conform to the grooming standards at the Hyundai facility after being placed there by Dynamic Security.

**RESPONSE:** Plaintiff objects to this request to the extent “grooming standards at the Hyundai facility” is undefined and vague. Plaintiff denies

**this request and states she wore her hair in a manner approved by Dynamic Security, was never shown any Hyundai grooming standard that applied to her because she was not a uniformed officer, and she complied with her supervisors' direction to cover her hair with a hat when she returned to the facility on her second day.**

6. Admit that you never informed anyone at Dynamic Security that you were pregnant.

**RESPONSE: Plaintiff denies this Request and states she informed both Gloria Robinson and Maurice Chambliss of her pregnancy and provided a note from her physician that she was fit for duty and told her co-worker LaTunya Howell.**

7. Admit that you confronted an employee at the Hyundai facility about reporting to Dynamic Security a complaint you made.

**RESPONSE: Plaintiff objects to this request in so far as "confronted" is vague and undefined. Plaintiff admits that she told her co-worker LaTunya Howell and supervisor Maurice Chambliss that she felt discriminated against and asked Chambliss if she could speak with Human Resources.**

8. Admit that, in March 2019, your mailing address was 6940 Wrangler Road, Apt. C, Montgomery, AL 36117.

**RESPONSE: Admitted.**

9. Admit that you were not aware of any delays or problems receiving mail at your address of 6940 Wrangler Road, Apt. C., Montgomery, Alabama 36117, during the month of March 2019.

**RESPONSE:** Plaintiff objects to this request because she would have no way to know whether mail delivery was or was not problematic without receiving notice from senders of failed delivery. To the extent this request applies to seeking information about receipt of any Dismissal and Notice of Rights, Plaintiff objects to this request as assuming that the request was mailed to Plaintiff. Plaintiff admits that after she filed this lawsuit she became aware that she had not received a Dismissal and Notice of Rights from the EEOC but cannot state with certainty that the failure was on the part of the post office for failing to deliver or the EEOC for failing to mail.

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Respectfully submitted,

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**Certificate of Service**

I hereby certify that I have served the foregoing on all counsel of record by e-mail as agreed among the parties on this 11th day of April, 2022 as follows:

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